

Christina M. Sprenger, Esq. [State Bar No. 205105]

E-mail: csprenger@lbaclaw.com

Aamir Raza, Esq. [State Bar No. 223530]

E-mail: araza@lbaclaw.com

LAWRENCE BEACH ALLEN & CHOI, PC

E-mail: LBACOCstaff@lbaclaw.com

959 South Coast Drive, Suite 260

Costa Mesa, California 92626

Telephone No.: (714) 479-0180

Attorneys for Defendants SAN BERNARDINO SHERIFF'S DEPARTMENT,  
VICTORVILLE POLICE DEPARTMENT, THOMAS BECHTOL, JONATHAN  
CAHOW, CLAYTON BRANDT, STUART CULLUM, and STARSUN FINCEL

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JASPER O. CROOK,

Claimant,

vs.

SAN BERNARDINO COUNTY SHERIFF'S  
DEPARTMENT; VICTORVILLE POLICE  
DEPARTMENT; THOMAS BECHTOL,  
individually and in his official  
capacity; JONATHAN CAHOW, individually  
and in his official capacity; CLAYTON  
BRANDT, individually and in his official  
capacity; STUART CULLUM, individually  
and in his official capacity; STARSUN  
FINCEL, individually and in his official  
capacity; and DOES 1-10 inclusive, in  
their individual and official capacities,

Defendants.

) Case No.: 5:23-cv-02448-JVS-AS

)

) **DECLARATION OF AAMIR**

) **RAZA IN SUPPORT OF**

) **DEFENDANTS' OPPOSITION**

) **TO PLAINTIFF'S MOTION FOR**

) **SUMMARY JUDGMENT**

)

) *[Motion for Summary Judgment;*

) *Separate Statement; Request for*

) *Judicial Notice; Notice of Manual*

) *Filing/Lodging; and [Proposed]*

) *Judgment submitted concurrently*

) *herewith]*

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)

)

) **Matter for Determination Before**

) **the Honorable Magistrate Alka**

) **Sagar**

TO THE HONORABLE COURT AND PRO SE PLAINTIFF:

1 Defendants SAN BERNARDINO COUNTY SHERIFF’S DEPARTMENT,  
2 VICTORVILLE POLICE DEPARTMENT, T. BECHTOL, JONATHAN CAHOW,  
3 CLAYTON BRANDT, STUART CULLUM, and STARSUN FINCEL (collectively  
4 “Defendants”)hereby submit the Declaration of Aamir Raza with exhibits in support  
5 of their Opposition to Plaintiff’s Motion for Summary Judgment

6 Respectfully submitted,

7 LAWRENCE BEACH ALLEN & CHOI, PC  
8

9 Dated: November 12, 2024

By /s/ Aamir Raza

10 CHRISTINA M. SPRENGER

11 AAMIR RAZA

12 Attorneys for Defendants

13 SAN BERNARDINO SHERIFF’S

14 DEPARTMENT, THOMAS BECHTOL,

15 JONATHAN CAHOW, CLAYTON

16 BRANDT, STUART CULLUM, and

17 STARSUN FINCEL  
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**DECLARATION OF AAMIR RAZA**

I, Aamir Raza, declare and state as follows:

1. I am an attorney at law, duly authorized to practice before this Court, and I am an attorney at the law firm Lawrence Beach Allen & Choi, P.C. attorneys of record for Defendants San Bernardino County Sheriff's Department, Victorville Police Department, Thomas Bechtol, Jonathan Cahow, Clayton Brandt, Stuart Cullum, and Starsun Fincel ("Defendants"). The facts set forth herein are of my own personal knowledge, except those stated upon information and belief, and as to those matters, I believe them to be true. If called to testify, I could and would competently testify thereto.

2. Attached as Exhibit "D" to the contemporaneously submitted Notice of Manual Filing is a true and correct copy of an audio file named "Audio 1 - Crook Contact" that had been kept in the ordinary course of business at the San Bernardino County Sheriff's Department. The file has been produced to Plaintiff with Bates Number DEF\_0044 as part of Defendant San Bernardino's Response to Plaintiff's Request for Production of Documents, Set One on July 1, 2024.

3. A true and correct copy of the transcription of the entirety of "Audio 1 - Crook Contact" by certified court reporter Jaclyn D. Kinsbursky (C.S.R. No. 13858) is attached hereto as Exhibit "E".

4. Attached hereto as Exhibit "F" to the contemporaneously submitted Notice of Manual Filing is a true and correct copy of a video file named "Video 1 - Crook Contact" that had been kept in the ordinary course of business at the San Bernardino County Sheriff's Department. The file has been produced to Plaintiff with Bates Number DEF\_0064 as part of Defendant San Bernardino's Response to Plaintiff's Request for Production of Documents, Set One on July 1, 2024.

5. Attached hereto as Exhibit "G" is a redacted, but true and correct copy of a Search Warrant and Affidavit that had been kept in the ordinary course of business at the San Bernardino County Sheriff's Department. It has been produced

1 to Plaintiff with Bates Numbers DEF\_0039-DEF\_0043 as part of Defendant San  
2 Bernardino's Response to Plaintiff's Request for Production of Documents, Set One  
3 on July 1, 2024.

4 6. San Bernardino County contracts with the City of Victorville to provide  
5 law enforcement services. The "Victorville Police Department" is a sub-station  
6 staffed and operated by the San Bernardino County Sheriff's Department.

7 7. Attached hereto as Exhibit "H" is a true and correct copy of a  
8 declaration submitted by Plaintiff Jasper Crook in the related case of United States  
9 District Court - Central District Case Number 5:22-cv-00010-JVS-SP, entitled  
10 *Rachel M. Crook v. San Bernardino Sheriff's Department, Thomas Bechtol,*  
11 *Jonathan Cahow, Clayton Brandt, Stuart Cullum, and Starsun Fincel* (Crook #1).

12 7. Attached hereto as Exhibit "I" is a redacted, but true and correct copy  
13 of the Crime Reports prepared regarding DR#172111554, the encounter with Jasper  
14 Crook on December 2, 2021, that had been kept in the ordinary course of business at  
15 the San Bernardino County Sheriff's Department. The reports have been produced  
16 to Plaintiff with Bates Number DEF\_0001 through DEF\_0014 as part of Defendant  
17 San Bernardino's Response to Plaintiff's Request for Production of Documents, Set  
18 One on July 1, 2024.

19 8. Attached hereto as Exhibit "J" is a redacted, but true and correct copy  
20 of the Receipts signed by Jasper Crook that had been kept in the ordinary course of  
21 business at the San Bernardino County Sheriff's Department. The reports have been  
22 produced to Plaintiff with Bates Number DEF\_0015 through DEF\_0017 as part of  
23 Defendant San Bernardino's Response to Plaintiff's Request for Production of  
24 Documents, Set One on July 1, 2024.

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1 I declare under penalty of perjury under the laws of the State of California  
2 that the foregoing is true and correct.

3 Executed on November 12, 2024, at Costa Mesa, California.  
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5 /s/ Aamir Raza

6 Aamir Raza  
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